The Federal Drug Testing Custody and Control Form (CCF OMB No. 0930-0158, Exp. Date: 6/30/2003) must be used to document every urine collection required by the DOT drug testing program. The CCF must be a five-part carbonless manifold form. This form may be viewed on the DOT web site (http://www.dot.gov/ost/dapc/) or the Department of Health and Human Services (HHS) web site http://workplace.samhsa.gov/. CCFs are also available from a number of different sources (e.g., laboratories, service agents) although they are usually part of the urine collection kits provided by a laboratory.

The CCF consists of the following five copies:
- Copy 1. Laboratory Copy - accompanies the specimen to the laboratory
- Copy 2. Medical Review Officer Copy - sent to the MRO
- Copy 3. Collector Copy - retained by the collector
- Copy 4. Employer Copy - sent to the employer
- Copy 5. Employee Copy - given to the employee

The CCF is completed as follows:
Step 1 (Copy 1). This step is completed by the collector or employer representative prior to the employee providing a urine specimen. The employer and MRO names, addresses, and telephone and fax numbers may be preprinted or handwritten. If the employer has designated a service agent to receive the results from the MRO, the employer’s address may be omitted and the service agent’s address may be used. However, in all cases, the specific employer’s name, telephone and fax numbers must be included. A clinic or collection site name may not be used in lieu of an employer name. The collector enters the employee’s social security number or employee’s ID number after verifying the employee’s identity. The collector also marks the appropriate box to indicate the reason for the test and the appropriate box for the type of drug tests to be performed (all DOT drug tests are for five drugs). The collector then enters the information required for the collection site (this information may also be preprinted). The collector’s telephone number is critical, since the laboratory or the MRO may need to contact the collector if they have questions related to a collection.

Step 2 (Copy 1). This step is completed by the collector after receiving the specimen from the employee and observing the temperature of the specimen. This step requires the collector to mark the appropriate box to indicate if the temperature of the specimen was within the required temperature range. This step also requires the collector to indicate whether it is a split specimen or single specimen collection, to indicate if no specimen was collected and why, or to indicate if it was an observed collection and why.

Note: All DOT collections are split specimen collections and should never have the single specimen collection box checked.

Step 3 (Copy 1). This step instructs the collector to seal and date the specimen bottles, have the employee initial the bottle seals after placing them on the bottles, and then instruct the employee to complete step 5 on the MRO copy (Copy 2).

Step 5 (Copy 2; note this differs from the other steps in that the collector turns to Copy 2 for the employee to fill out and then turns back to Copy 1). This step is completed by the employee (listed as donor on the CCF). The employee reads the certification statement, prints his or her name, provides date of birth, daytime and evening telephone numbers, date of collection, and signs the form. After the employee completes this portion of the CCF, the collector reviews it to ensure that all the required information was provided.

Step 4 (Copy 1). This step is initiated by the collector and then completed by the laboratory after the laboratory accessions the specimen. This step requires the collector to sign the form to certify that the specimen was collected, labeled, sealed, and released for shipment to the laboratory in
accordance with Federal requirements. The collector is also required to note the time of the collection, the date of collection, and the specific name of the delivery service to whom the specimen is released for shipment to the laboratory.

Note: There is no requirement for couriers, express carriers, or postal service personnel to add additional documentation to the chain of custody for the specimens during transit because they do not have direct access to the specimens or the CCF. Chain of custody annotations resume when the shipping container/package is opened and accessioned at the laboratory.

Step 5(a) (Copy 1). This step is completed by the laboratory to report the test result of the primary specimen.

Step 5(b) (Copy 1). This step is completed by the laboratory to report the test result of the split specimen if the split specimen is tested.

Step 6 (Copy 2). This step is completed by the MRO in reporting the results of the primary specimen to the employer.

Step 7 (Copy 2). This step is completed by the MRO in reporting the results of the split specimen to the employer.

The bottom area of Copy 1 is reserved for the tamper-evident specimen bottle seals/labels. There must be two seals/labels (i.e., one marked with the letter "A" to designate the primary specimen and the other marked with the letter "B" to designate the split specimen) to accommodate collecting split specimens. Each seal/label must have the same preprinted specimen identification number that appears at the top of the CCF. Each seal/label must also have a place for the collector to annotate the date of the collection and a place for the employee to initial each seal/label after it is placed on the specimen bottle.

Note: No one (including collection site personnel or the collector) is permitted to require an employee to sign a consent, release, or waiver of liability, or indemnification agreement with respect to any part of the drug testing process. Collection sites (clinics) may not use “generic” consent forms for DOT-required urine specimen collections, even if their clinic policy requires consent from the general patient population.

**DOT-REGULATED AND NON-REGULATED EMPLOYERS**

Employers regulated by the Department of Transportation (as well as Federal agencies) are required to use the OMB approved Federal Drug Testing Custody and Control Form for their workplace drug testing programs. All other employers or private sector companies and non-DOT testing conducted by DOT-regulated employers are prohibited from using the Federal CCF. (The Federal Railroad Administration has specific CCFs, which must be used for post-accident testing in the railroad industry.)

In the rare instance where the collector, either by mistake or as the only means to conduct a test under difficult circumstances (e.g., post-accident test with insufficient time to obtain the CCF), uses a non-Federal or Forensic form for a regulated collection, the use of a non-Federal or Forensic form does not, in and of itself, present a reason for the laboratory to reject the specimen for testing or for the MRO to cancel the test. However, if the laboratory or the MRO discovers the use of the incorrect form, a signed statement must be obtained from the collector stating the reason why the Federal CCF was not used for the regulated collection.

If you have any questions regarding this article please call me at (858) 467-7687.

Rebecca Ekorn
Sr. Compliance Administrator